

The Law Office of Paula J. Notari  
125 Park Avenue, 8<sup>th</sup> Floor  
New York, New York 10017  
Tel. (646) 943-2172

August 3, 2021

BY ECF

Hon. Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Stephen Odiboh, 19 CR 809 (LGS)

Dear Judge Schofield:

I am writing on behalf of the defendant Stephen Odiboh in the above-entitled matter to request a modification of Mr. Odiboh's current bail conditions as stated herein. This request is made with consent from the government and United States Pretrial Officer Josh Rothman.

First, we respectfully ask the Court to allow Mr. Odiboh to travel from Georgia, the state where he currently resides to Connecticut at the end of August. In the way of background, Mr. Odiboh has been in full compliance since he was released on bail back in February of 2021; he was released from the MDC located in Brooklyn and travelled to Georgia by airplane where he resides with his family. Mr. Odiboh's son Kennedy was recently named the Valedictorian of his high school graduating class and he has committed to Yale University in Connecticut. We seek permission to allow Mr. Odiboh to travel to Connecticut in late August to help set Kennedy up for the start of his school year. Mr. Odiboh will be driving roundtrip to Connecticut, and he will provide Officer Rothman with details regarding his travel dates and where he will be staying during this period of travel.

Additional, Mr. Odiboh's work in Georgia as a tow truck driver sometimes includes hauling cars and requests are sometimes made to travel outside the Georgia border for a period of 3 to 4 hours to places like South Carolina. Officer Rothman does not object to granting Mr. Odiboh permission to travel for work only under these limited conditions.

Finally, at the urging of Pretrial Officer Rothman we are seeking to modify Mr. Odiboh's conditions of release to include a curfew set by his pretrial services officer which will allow Mr. Odiboh to leave home at a certain time in the morning and return home by a certain time in the evening. Currently, Mr. Odiboh's conditions of home detention only permits him to leave from his residence for specific purposes (i.e., work). Officer Rothman explains that a curfew would give Mr. Odiboh more freedom of movement throughout the community. Mr. Odiboh has been fully compliant with all his conditions while on pretrial release and Officer Rothman recommends that an added condition of a curfew as described herein is appropriate for the reasons stated herein.

*United States v. Stephen Odiboh, 19 CR 809*

Hon. Lorna G. Schofield

*August 3, 2021*

Page 2 of 2

Based on the foregoing Mr. Odiboh is respectfully requesting with consent from the government and his pretrial service officer that the Court modify the condition of his bail to (1) allow him to travel to Connecticut at the end of August so that he can drive his son to college (2) grant Mr. Odiboh permission to travel outside of the state of Georgia for work related purposes subject to the conditions set by his pretrial services officer and (3) to add the condition of curfew as determined by his pretrial services officer.

Respectfully submitted,

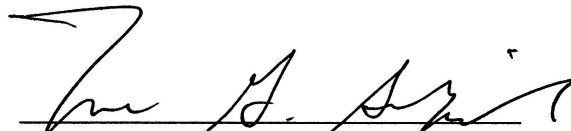
/S/

Paula J. Notari  
Attorney for Stephen Odiboh

cc: All Parties ECF

The unopposed modifications to Defendant Odiboh's conditions of bail as set forth above are SO ORDERED. All other conditions of bail shall remain in effect. The Clerk of the Court is directed to terminate the letter motion at docket number 88.

Dated: August 6, 2021  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE